UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MARYLAND NORTHERN DIVISION

JOHN NORMAN HUFFINGTON

Plaintiff,

v. Case No. 1:25-cv-02313

DAVID SANEMAN, et al. Hon. Brendan Abell Hurson

Defendants.

CONSENT PLAINTIFF'S MOTION FOR EXTENSION OF TIME TO RESPOND TO DEFENDANT JOSEPH CASSILLY'S MOTION TO DISMISS

Plaintiff John Huffington, by and through his counsel, respectfully requests that the Court extend the time for Plaintiff to respond to the Motion to Dismiss filed on the official capacity claim against Joseph Cassilly (Doc. 42) for 28 days, until December 5, 2025. Plaintiff's counsel corresponded with counsel for Defendant on November 5, 2025. Counsel consented to the relief sought here. Plaintiff states the following in support:

- 1. Plaintiff filed his Complaint on July 16, 2026 (Doc. 1), and then his First Amended Complaint on September 9, 2025, which was limited to updating certain estate defendants to identify their personal representatives (Doc. 14).
- 2. In his First Amended Complaint, Plaintiff brings official capacity claims against Joseph Cassilly. (Doc. 14.)
- 3. On November 4, 2025, a Motion to Dismiss Plaintiff's official capacity claims against Cassilly was filed. (Doc. 42.)
- 4. Pursuant to L.R. 105(2)(a), Plaintiff's response is due within 14 days, by November 18, 2025.

- 5. Pursuant to L.R. 105(9), on November 5, 2025, Plaintiff's counsel (John Marrese) conferred by email with counsel for Defendant (Wendy Schiff) to request a 28-day extension of time, up to and including December 5, 2025, for Plaintiff to respond. Counsel for Defendant responded that Defendant consents to the extension.
 - 6. No party will be prejudiced if the requested relief is granted.
 - 7. This request for relief is not posed for any vexatious or contumacious purpose.

WHEREFORE, Plaintiff John Huffington, respectfully requests that the Court extend his time to respond to the motion to dismiss the official capacity claims against Joseph Cassilly (Doc. 42), up to and including December 5, 2025, and grant any such other relief as necessary.

Respectfully submitted,

Date: November 5, 2025 JOHN HUFFINGTON

/s/ John Marrese
One of Plaintiff's Attorneys

Hannah Ernstberger SALLER ERNSTBERGER & MCELROY 10 South Street, #600 Baltimore, MD 21202 (410) 783-7945 hernstberger@sallerlaw.com

Brian Eldridge*
John Marrese*
Jay Kasperbauer*
HART MCLAUGHLIN & ELDRIDGE, LLC
One South Dearborn, Suite 1400
Chicago, IL 60603
(312) 955-0545
beldridge@hmelegal.com
jmarrese@hmelegal.com
jkasperbauer@hmelegal.com

^{*}Admitted pro hac vice